

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Periodic Reporting of Service Performance

Docket No. RM2022-7

**COMMENTS OF THE
NATIONAL POSTAL POLICY COUNCIL**
(June 3, 2022)

The National Postal Policy Council (“NPPC”) respectfully submits these comments in response to Order No. 6160.¹ That Order invited interested parties to comment on certain proposals to improve existing annual and periodic service reporting requirements and related revisions consistent with the service “dashboard” required by the Postal Service Reform Act of 2022.

I. THE ORDER PROPOSES USEFUL IMPROVEMENTS TO CURRENT SERVICE REPORTING REQUIREMENTS

NPPC generally supports the approach that the Commission has described in Order No. 6160. Although NPPC is skeptical of imposing reporting requirements on the Postal Service that do not provide actionable information or benefit to business mailers and/or the mailing public, it does support improvements, such as those proposed in the Order, that provides useful and actionable information.

NPPC members today can obtain some service information through the Intelligent Barcode system. However, that information is limited to their own

¹ Order No. 6160, Docket No. RM2022-7 (Apr. 26, 2022) (Advance Notice of Proposed Rulemaking to Revise Periodic Reporting of Service Performance).

companies and do not provide insights into how the postal system is performing more broadly. Having timely information on service performance in various parts of the nation could help mailers understand whether any problems that they are experiencing are systemic or more individualized to them. It could also warn them of issues that potentially could affect time-sensitive mailings, such as when service is affected by issues ranging from weather to staffing to logistics.

The Commission's proposed changes to 39 C.F.R. part 3055 appear reasonable. NPPC here addresses two proposals of specific importance to its members.

First, NPPC supports the Commission's proposal to require the Postal Service to report the average calendar days for delivery for all Market Dominant products. Actual days to delivery would be more useful to mailers than the current reports that focus only on the percentages of mail that meet standards, although the percentage reports are useful for reviews of longer-term performance. Furthermore, the Commission should ensure that reports on actual days of delivery include a report on "tail of the mail."

NPPC understands that this requirement would apply to each separate product, as defined in the Mail Classification Schedule, and would not be limited to reporting on a class level only.

Second, NPPC supports the Commission's proposal to require the Postal Service to report regularly on mail (a) excluded from measurement and (b) mail volumes measured and not measured by the Full-Service Intelligent Mail barcode. Service performance measurements, to be credible and useful, should

provide as complete a report on the mail system as possible, and NPPC encourages the Postal Service to work diligently to reduce the categories of mail that are excluded from the measurement system.

In addition, in Docket No. PI2022-3, the Postal Service stated that it intends to update its service performance measurement plan to report separately Reply Mail within First-Class Single-Piece Mail. NPPC supported that change as desirable and as a first step towards reporting remittance mail.² In this proceeding, the Commission should consider adopting corresponding reporting requirements.

II. A USEFUL AND FUNCTIONAL POSTAL SERVICE DASHBOARD MUST ENABLE MAILERS TO SEARCH FOR AND OBTAIN THE INFORMATION THEY NEED

The Order also solicits comment on implementing the Postal Service Reform Act's requirement that the Service develop an online dashboard that "provides performance information for market-dominant products that is updated on a weekly basis." Order No. 6160 at 7, *quoting* 39 U.S.C. §3692(c)(1). The new legislation directs the Commission to set requirements for the Postal Service to publish "nationwide, regional, and local delivery area performance information." *Id.* at 7-8. And Congress required the information to be as granular geographically as appropriate. 39 U.S.C. §3692(b)(1)(B).

The dashboard is a particularly important improvement that, if implemented properly, will offer substantial utility to the mailing public and to

² Perhaps Facing Identification Marks and Service Type Identifiers could be used to identify and isolate remittance mail for data purposes.

business mailers which collectively generate the vast majority of Market Dominant (and Competitive) volumes and revenues. These include NPPC members, which are among the Service's largest customers.

NPPC strongly supports implementation of a fully functional and interactive dashboard and commends the Congress for requiring this innovation. While quarterly or year-end reports pursuant to 39 U.S.C. §3652 are useful for some purposes, they are of far less practical utility to market-dominant mailers than data that is either real-time or close to real-time.

Thus, for the dashboard to be useful and effective, it must be implemented in the broad and granular fashion Congress prescribed. The Commission should establish the expectations for the dashboard, consistent with the statute.³ There are a very large number of parameters and interactive filters that could benefit businesses and the mailing public if they were available. In this regard, though, NPPC submits that, at minimum, the following should be accessible on the dashboard, enabling mailers and the public to see:

- Service performance by mail class and product for the entire nation;
- Service data by time period;
- Service performance from particular originating 3-Digit or 5-Digit areas of their choosing;
- Service performance for a particular destinating 3-Digit or 5-Digit areas of their choosing;
- Service performance based on a selected pair of origin/destination areas of their choosing;

³ NPPC members are willing to work with the Postal Service to flesh out the details to implement these tools.

- The percentage of mail that is actually measured for the selected query; and
- Remittance mail performance by 5-Digit or 9-Digit ZIP Code

Equally importantly, mailers should be able to filter the data by:

- Mail shape;
- Service standard. In First-Class Mail, 3-day, 4-day, and 5-day should be presented and queried separately, not lumped together (which obscures important information); and
- CRID/MID (subject to confidentiality where appropriate).

Finally, interested mailers should be able to export the relevant underlying data in either comma-separated or Excel data format.

A dashboard enabling mailers to query and find these categories of information would substantially improve transparency into postal operations and help identify service problems. And enabling the public to see, on a near real-time basis, the Postal Service's performance for mail subject to the postal monopoly should promote accountability and public confidence in the Service.

Accordingly, the National Postal Policy Council respectfully urges the Commission to propose regulations consistent with the proposals in Order No. 6160 and these comments.

Respectfully submitted,

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